



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

UNION ELECTRIC COMPANY

DOCKET NO. STN 50-483

CALLAWAY PLANT UNIT NO. 1

RENEWED FACILITY OPERATING LICENSE

Renewed License No. NPF-30

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for renewed license filed by Union Electric Company* (licensee), complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I, and all required notifications to other agencies or bodies have been duly made;
 - B. Construction of the Callaway Plant, Unit No. 1 (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-139 and the application, as amended, the provisions of the Act, and the regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission;
 - D. There is reasonable assurance: (i) that the activities authorized by this renewed operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - E. Union Electric Company is technically qualified to engage in the activities authorized by this renewed license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;
 - F. The licensee has satisfied the applicable provisions of 10 CFR Part 140 "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
 - G. The issuance of this renewed license will not be inimical to the common defense and security or to the health and safety of the public;

*As of the closing of the Merger contemplated by the Agreement and Plan of Merger, by and among Union Electric Company, CIPSCO Incorporated, Ameren Corporation and Arch Merger, Inc., dated August 11, 1995, Union Electric Company is a wholly-owned operating subsidiary of Ameren Corporation.

- H. After weighing the environmental, economic, technical and other benefits of the facility against environmental and other costs and considering available alternatives, the issuance of this Renewed Facility Operating License No. NPF-30, subject to the conditions for protection of the environment set forth in the Environmental Protection Plan attached as Appendix B, is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied; and
 - I. The receipt, possession, and use of source, byproduct and special nuclear material as authorized by this renewed license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40 and 70; and.
 - J. Actions have been identified and have been or will be taken with respect to (1) managing the effects of aging during the period of extended operation on the functionality of structures and components that have been identified to require review under 10 CFR 54.21(a)(1), and (2) time-limited aging analyses that have been identified to require review under 10 CFR 54.21(c), such that there is reasonable assurance that the activities authorized by this renewed license will continue to be conducted in accordance with the current licensing basis, as defined in 10 CFR 54.3, for the facility, and that any changes made to the facility's current licensing basis in order to comply with 10 CFR 54.29(a) are in accordance with the Act and the Commission's regulations.
2. Pursuant to approval by the Nuclear Regulatory Commission at a meeting on October 4, 1984, the License for Fuel Loading and Low Power Testing, License No. NPF-25, issued on June 11, 1984, is superseded by Renewed Facility Operating License No. NPF-30 hereby issued to Union Electric Company (UE) to read as follows:
- A. The renewed license applies to the Callaway Plant, Unit No. 1, a pressurized water nuclear reactor and associated equipment (the facility), owned by Union Electric Company. The facility is located in central Missouri within Callaway County, Missouri, and is described in the licensee's "Final Safety Analysis Report", as supplemented and amended, and in the licensee's Environmental Report, as supplemented and amended.
 - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses Union Electric Company (UE):
 - (1) Pursuant to Section 103 of the Act and 10 CFR Part 50 "Domestic Licensing of Production and Utilization Facilities," UE to possess, use and operate the facility at the designated location in Callaway County, Missouri, in accordance with the procedures and limitations set forth in this renewed license;
 - (2) UE, pursuant to the Act and 10 CFR Part 70, to receive; possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;

- (3) UE, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) UE, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source of special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) UE, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

UE is authorized to operate the facility at reactor core power levels not in excess of 3565 megawatts thermal (100% power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan*

The Technical Specifications contained in Appendix A, as revised through Amendment No. 223 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Environmental Qualification (Section 3.11, SSER #3)**

Deleted per Amendment No. 169.

*Amendments 133, 134, & 135 were effective as of April 30, 2000 however these amendments were implemented on April 1, 2000.

**The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

- (4) Surveillance of Hafnium Control Rods (Section 4.2.3.1(10), SER and SSER #2)

Deleted per Amendment No. 169.

- (5) Fire Protection Program

Union Electric shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment requests dated 8/29/2011 and 11/7/2019 (and supplements dated 11/9/2011, 4/17/2012, 7/12/2012, 2/19/2013, 8/5/2013, 9/24/2013, 12/19/2013 and 1/15/2020) and as approved in the safety evaluation reports dated 1/13/2014 and 11/3/2020. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- (a) Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
- (b) Prior NRC review and approval is not required for individual changes that result in a risk increase less than 1×10^{-7} /year (yr) for core damage frequency (CDF) and less than 1×10^{-8} /yr for large early release frequency (LERF). The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

Other Changes that May Be Made Without Prior NRC Approval

- (1) Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program and Design Elements.

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805, Chapter 3, element is functionally equivalent to the corresponding technical requirement. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure or physical arrangement, using a relevant technical requirement or standard.

The licensee may use an engineering evaluation to demonstrate that changes to certain NFPA 805, Chapter 3, elements are acceptable because the alternative is “adequate for the hazard.” Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure or physical arrangement, using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are as follows:

- “Fire Alarm and Detection Systems” (Section 3.8);
- “Automatic and Manual Water-Based Fire Suppression Systems” (Section 3.9);
- “Gaseous Fire Suppression Systems” (Section 3.10);
- and,
- “Passive Fire Protection Features” (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

(2) Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation report dated 1/13/2014 to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

Transition License Conditions

(1) Before achieving full compliance with 10 CFR 50.48(c), as specified by (2) below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in (2) above.

(2) The licensee shall implement the items listed in Enclosure 2, Attachment S, Table S-3, "Implementation Items," of Ameren Missouri letter ULNRC-06060, dated December 19, 2013, by 8 months from the date of issuance of the license amendment.

(6) Qualification of Personnel (Section 13.1.2, SSER #3, Section 18, SSER #1)

Deleted per Amendment No. 169.

(7) NUREG-0737 Conditions (Section 22, SER)

Deleted per Amendment No. 169.

(8) Post-Fuel-Loading Initial Test Program (Section 14, SER)

Deleted per Amendment No. 169.

(9) Inservice Inspection Program (Sections 5.2.4 and 6.6, SER)

Deleted per Amendment No. 169.

(10) Emergency Planning

Deleted per Amendment No. 169.

(11) Steam Generator Tube Rupture (Section 15.4.4, SSER #3)

Deleted per Amendment No. 169.

(12) Low Temperature Overpressure Protection (Section 15, SSER #3)

Deleted per Amendment No. 169.

(13) LOCA Reanalysis (Section 15, SSER #3)

Deleted per Amendment No. 169.

(14) Generic Letter 83-28

Deleted per Amendment No. 169.

(15) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:

1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following:

1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available, pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:

1. Water spray scrubbing
2. Dose to onsite responders

(16) Additional Conditions

The Additional Conditions contained in Appendix C, as revised through Amendment No. 190, are hereby incorporated into this renewed license. UE shall operate the facility in accordance with the Additional Conditions.

(17) License Renewal License Conditions

(a) The information in the Final Safety Analysis Report (FSAR) supplement, submitted pursuant to 10 CFR 54.21(d), is henceforth part of the FSAR which will be updated in accordance with 10 CFR 50.71(e). As such, the licensee may make changes to the programs and activities described in the FSAR supplement, without prior Commission approval, provided the licensee evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

(b) The licensee's FSAR supplement submitted pursuant to 10 CFR 54.21(d), as revised during the license renewal application review process, and as revised in accordance with license condition 2.C.(17)(a), describes certain programs to be implemented and activities to be completed prior to the period of extended operation.

1. UE shall implement those new programs and enhancements to existing programs no later than April 18, 2024.
2. UE shall complete those designated inspection and testing activities, as noted in Appendix A of the "Safety Evaluation Report Related to the License Renewal of Callaway Plant, Unit 1," dated August 2014, no later than April 18, 2024, or the end of the last refueling outage prior to the period of extended operation, whichever occurs later.
3. UE shall notify the NRC in writing within 30 days after having accomplished item (b)1 above and include the status of those activities that have been or remain to be completed in item (b)2 above.

(c) UE shall complete the following activities related to the reactor pressure vessel (RPV) closure stud and stud holes described in Commitments 41 and 42 of Appendix A of the "Safety Evaluation Report Related to the License Renewal of Callaway Plant, Unit 1," dated August 2014, no later than April 18, 2024, or the end of the last refueling outage prior to the period of extended operation, whichever occurs later:

1. In order to ensure that the threads for RPV closure stud hole No. 18 can perform their intended function throughout the period of extended operation, UE shall remove stuck stud No. 18. If repair of stud hole No. 18 is required following removal of the stud, the repair plan shall include inspection of the stud hole prior to and after the completion of the repair.
2. In order to ensure that RPV stud holes with damaged threads can continue to perform their intended function throughout the period of extended operation, UE shall perform a laser inspection for the threads of repaired RPV stud hole location Nos. 2, 4, 5, 7, 9, and 53. If inspection of these RPV stud holes reveals that there is additional degradation in any of these stud holes, the condition will be entered in the Corrective Action Program for evaluation and corrective action, and UE shall also inspect the remaining repaired RPV stud hole locations (Nos. 13, 25, 39 and 54).

(18) Implementation Actions for New Technical Specification 3.7.20

The planned plant modifications and emergency operating procedure changes described as commitments in Attachment 5 of Ameren Missouri letter ULNRC-06477, "Supplement to License Amendment Request for Addition of New Technical Specification 3.7.20, 'Class 1E Electrical Equipment Air Conditioning (A/C) System' (LDCN 16-0013)," dated January 23, 2019, shall be completed prior to implementation of the license amendment requested per Ameren Missouri letter ULNRC-06401, "License Amendment Request for Addition of New Technical Specification 3.7.20, 'Class 1E Electrical Equipment Air Conditioning (A/C) System' (LDCN 16-0013)," dated March 9, 2018, as supplemented by the noted January 23, 2019 letter (ULNRC-06477) and Ameren Missouri letter ULNRC-06491, "Additional Supplement to License Amendment Request for Addition of New Technical Specification 3.7.20, 'Class 1E Electrical Equipment Air Conditioning (A/C) System' (LDCN 16-0013)," dated March 7, 2019. Completion of the planned plant modifications means physical completion, including completion of the post-modification testing.

- D. An Exemption from certain requirements of Appendix J to 10 CFR Part 50, are described in the October 9, 1984 staff letter. This exemption is authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, this exemption is hereby granted pursuant to 10 CFR 50.12. With the granting of this exemption the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.
- E. UE shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements

revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 10 CFR 73.21, are entitled: "Callaway Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 20, 2004, as supplemented by the letter May 11, 2006.

UE shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Callaway Plant Unit 1 CSP was approved by License Amendment No. 203, as supplemented by changes approved per License Amendment No. 214.

- F. Deleted per Amendment No. 169.
- G. UE shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- H. This renewed license is effective as of the date of issuance and shall expire at Midnight on October 18, 2044.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

William M. Dean, Director
Office of Nuclear Reactor Regulations

Attachments/Appendices:

1. Attachment 1 (Deleted per Amendment No. 169)
2. Attachment 2 (Deleted per Amendment No. 169)
3. Appendix A - Technical Specifications (NUREG-1058, Revision 1)
4. Appendix B - Environmental Protection Plan
5. Appendix C - Additional Conditions

Date of Issuance: March 6 , 2015

ATTACHMENT 1

Deleted per Amendment No. 169.

ATTACHMENT 2

Deleted per Amendment No. 169.